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Via ECF

May 27, 2020

Honorable Loretta A. Preska
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Room 2220
New York, NY 10007

Re: ***Giuffre v. Dershowitz*, Case No. 19-cv-3377-LAP**
Request for Extension

Dear Judge Preska,

Defendant Alan Dershowitz (“Defendant”) hereby requests a two week extension of time to file a response to Virginia L. Giuffre’s Motion to Dismiss Counterclaims (“Motion”). [Dkt. 119]. Pursuant to Local Rule 6.1(b), the original deadline is set for June 2, 2020. [Dkt. 119]. Counsel for Plaintiff has assented to this request but also requests an additional one week extension of time to file her reply.

Defendant’s extension is necessary due to the ongoing pandemic and the recent flood of counsel’s office when a water pipe burst on the floor above the firm. As a result of the latter, counsel’s office is under reconstruction and is not expected to reopen until mid-June at the earliest even if the City of Boston permits earlier reopenings. Moreover, a member of Defendant’s counsel, Christian Kiely, is currently on parental leave and thus is unavailable. Plaintiff’s request is necessary because the counsel who has primarily been drafting this briefing is just returning to part-time work following maternity leave.

This is the parties’ first request for an extension to the briefing with respect to this Motion. The parties are currently progressing on document discovery. As such, the extension in this briefing schedule should not affect any other scheduled dates in the litigation.

Accordingly, Defendant respectfully requests that the Court extend Defendant’s deadline to respond to Plaintiff’s Motion to June 16, 2020 and extend Plaintiff’s deadline to file a reply to June 30, 2020.

Thank you.

Respectfully Submitted,

Kristine C. Oren

CC: Plaintiff/Cooper & Kirk P.L.L.C. via ECF